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UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION

UNITED STATES OF AMERICA

v.

[1] LONNIE NEWSOME
A/K/A "Big Lonnie"

[4] TIM ALLEN
A/K/A "Lil Tim"

[5] ANTHONY BROOKS
A/K/A "A.B."

[6] ANTHONY LAMPKINS
A/K/A "Doo Daddy"

[10] DESHAUNE JONES
A/K/A "Mexico"

[22] BRANDON PRINCE

[23] SHAWN HOWELL

[27] KEAIRUS WILSON
A/K/A "Key-Thang"

[28] MONTEZ HALL
A/K/A "Tez"

[29] CEDRIC WOODS
A/K/A "Lil Ced"

[30] RONDARIUS WILLIAMSON
A/K/A "Killa"

[32] KENNETH GADDIE
A/K/A "K.G."

NO. 3:10-00163

JUDGE TRAUGER

18 U.S.C. 2

18 U.S.C. 4

18 U.S.C. 924(c)

18 U.S.C. 924(o)

18 U.S.C. 1959(a)(1)

18 U.S.C. 1959(a)(3)

18 U.S.C. 1959(a)(5)

18 U.S.C. 1959(a)(6)

18 U.S.C. 1962(d)

21 U.S.C. 841

21 U.S.C. 846

SECOND SUPERSEDING INDICTMENT

COUNT ONE

(Conspiracy to Participate in Racketeering Activity)

THE GRAND JURY CHARGES:

Introduction

1. In the early 1970s, a street gang that went by the name of “the Bloods” was formed in Los Angeles, California. As time passed, the Bloods gang spread to areas surrounding Los Angeles and other locations, and broke into individual units or “sets,” each identified or affiliated with a certain street, neighborhood, or area.

2. One such Bloods set based in Compton, California was called the Piru Bloods. The name is derived from Piru Street, which is located in Compton, California. Within the Piru Bloods, different subsets emerged, including, but not limited to, the Tree Top Pirus (TTP) and Eastside Skyline Pirus (ESP).

3. TTP’s name is derived from a group of streets in Compton named after trees. ESP’s name is derived from the Skyline neighborhood of southeast San Diego, California.

4. Over time, TTP and ESP have migrated to the Middle District of Tennessee, and elsewhere, and have followed and continue to follow many of the same practices as the Bloods gang on the West Coast, including the following:

a. an identification with the color red, which appears prominently in clothing, hats and bandanas worn by Bloods gang members on both the east and west coasts;

b. a long-term and often lethal rivalry with the Crips gang, whose signature color is blue;

- c. a hierarchal structure;
- d. a system of verbal codes to communicate with each other and to signify their association with the Bloods or a set of the Bloods, including the following:
 - e. “crab” is a derogatory term for a member of the rival Crips gang;
 - f. The letter “c” is often replaced with the letter “b” to represent the Bloods gang members’ disdain for the rival Crips gang;
 - g. “lick” is a term for robbery; and
 - h. “beans” is a term for hydromorphone, or dilaudid pills.

5. At times relevant to this Superseding Indictment, the following defendants and others known and unknown to the grand jury, were members and associates of the Bloods gang, a criminal organization involved in the commission of numerous acts of violence in the Middle District of Tennessee and elsewhere: [1] **LONNIE NEWSOME, a/k/a “Big Lonnie,”** [4] **TIM ALLEN, a/k/a “Lil Tim,”** [5] **ANTHONY BROOKS, a/k/a “A.B.,”** [6] **ANTHONY LAMPKINS, a/k/a “Doo Daddy,”** [10] **DESHAUNE JONES, a/k/a “Mexico,”** [22] **BRANDON PRINCE, a/k/a “Prince,”** [23] **SHAWN HOWELL,** [27] **KEAIRUS WILSON, a/k/a “Key-Thang,”** [28] **MONTEZ HALL, a/k/a “Tez,”** [29] **CEDRIC WOODS, a/k/a “Lil Ced,”** [30] **RONDARIUS WILLIAMSON, a/k/a “Killa,”** and [32] **KENNETH GADDIE, a/k/a “K.G.”**

6. At all times relevant to this Superseding Indictment, in order to join the Bloods gang, potential members were required to complete an initiation process. This process sometimes involved “missions” which referred to violent acts such as robberies, assaults, or murders. The initiation process also involved being “jumped in to” or “blessed in to” the gang. When a potential member was jumped in, other members of the Bloods gang would beat the new member for a period of time.

7. At all times relevant to this Superseding Indictment, Bloods gang members signified their membership and identified fellow members by wearing or “flagging” gang colors. The gang color of the Bloods was red. The Bloods gang members referred to one another by their gang names and often did not know fellow gang members except by their gang names.

8. At all times relevant to this Superseding Indictment, the Bloods gang members engaged in criminal activity, including but not limited to, murders, attempted murders, conspiracies to commit murder, assaults, attempted assaults, robberies, and drug trafficking. The Bloods gang members were required to commit acts of violence to maintain membership and discipline within the gang and against rival gangs. Participation in criminal activity by a member, particularly violent acts directed at rival gangs or as directed by the gang leadership, increased the respect accorded to that member, resulted in that member maintaining or increasing his position in the gang, and could have resulted in a promotion to a leadership position.

9. At all times relevant to this Superseding Indictment, the Bloods gang members met on a regular basis to, among other things, report on business related to the gang, including discussions of acts of violence, disciplinary actions against fellow gang members, identifying those believed to be cooperating with law enforcement authorities and inciting violence against them and other perceived enemies of the gang.

The Racketeering Enterprise

10. The Bloods gang, including its leadership, members and associates, constituted an “enterprise” as defined in Section 1961(4) of Title 18, United States Code, that is, a group of individuals associated in fact that engaged in, and the activities of which affected, interstate and foreign commerce. The enterprise constituted an ongoing organization whose members

functioned as a continuing unit for the common purpose of achieving the objectives of the enterprise.

Purposes of the Enterprise

11. The purposes of the enterprise included the following:
 - a. Preserving and protecting the power, territory and profits of the enterprise through the use of murder, armed robberies, aggravated assaults, intimidation, threats of violence, and narcotics trafficking;
 - b. Promoting and enhancing the enterprise and its members' and associates' activities, both in and out of prison, through the use of intimidation, violence, and threats of violence, including murder, assaults, robberies, and narcotics trafficking;
 - c. Keeping victims and potential victims in fear of the enterprise and in fear of its members and associates, through violence and threats of violence;
 - d. Generating financial profits in furtherance of the enterprise in and around Nashville, Tennessee;
 - e. Providing financial support and information to gang members, including those who were incarcerated for committing acts of violence or other offenses; and
 - f. Providing assistance to other gang members who committed crimes for and on behalf of the Bloods gang in order to hinder, obstruct and prevent law enforcement officers from identifying the offender, apprehending the offender, and trying and punishing the offender.

The Racketeering Conspiracy

12. From in and around 2006 and continuing through in or about December 2011, in the Middle District of Tennessee and elsewhere, the defendants, [1] **LONNIE NEWSOME**, a/k/a “Big Lonnie,” [4] **TIM ALLEN**, a/k/a “Lil Tim,” [5] **ANTHONY BROOKS**, a/k/a “A.B.,” [6] **ANTHONY LAMPKINS**, a/k/a “Doo Daddy,” [10] **DESHAUNE JONES**, a/k/a “Mexico,” [27] **KEAIRUS WILSON**, a/k/a “Key-Thang,” [28] **MONTEZ HALL**, a/k/a “Tez,” [29] **CEDRIC WOODS**, a/k/a “Lil Ced,” [30] **RONDARIUS WILLIAMSON**, a/k/a “Killa,” and [32] **KENNETH GADDIE**, a/k/a “K.G.” each being a person employed by and associated with the Bloods gang, an enterprise which engaged in, and the activities of which affected, interstate and foreign commerce, together with others known and unknown to the Grand Jury, did knowingly and intentionally conspire to conduct and participate, directly and indirectly, in the conduct of the affairs of the enterprise through a pattern of racketeering activity, as defined in Sections 1961(1) and (5) of Title 18, United States Code, consisting of:

- a. multiple acts indictable under 18 U.S.C. § 1951 (robbery and extortion affecting interstate commerce);
- b. multiple acts indictable under 18 U.S.C. § 1512 (tampering with a witness, victim, or an informant);
- c. multiple acts indictable under 18 U.S.C. § 1513 (retaliating against a witness, victim, or an informant);
- d. multiple acts involving narcotics trafficking, in violation of 21 U.S.C. § 846 (conspiracy to distribute and possess with intent to distribute controlled substances) and 21 U.S.C. § 841(a)(1) (distribution and possession with intent to distribute controlled substances);

e. multiple acts involving murder, in violation of the laws of the State of Tennessee, Tennessee Code Annotated, Sections 39-12-101, 39-12-103, 39-13-201, 39-13-202, 39-11-401, and 39-11-402;

f. multiple acts involving robbery, in violation of the laws of the State of Tennessee, Tennessee Code Annotated, Sections 39-12-101, 39-12-103, 39-13-401, 39-13-402, 39-11-401, and 39-11-402;

g. multiple acts involving bribery, in violation of the laws of the State of Tennessee, Tennessee Code Annotated, Sections 39-16-102, 39-16-107, 39-12-101, and 39-12-103;

h. multiple acts involving extortion, in violation of the laws of the State of Tennessee, Tennessee Code Annotated, Sections 39-14-112, 39-12-101, and 39-12-103; and

i. multiple acts involving dealing in controlled substances, in violation of the laws of the State of Tennessee, Tennessee Code Annotated, Sections 39-12-101, 39-12-103, 39-17-417, and 39-11-403.

13. It was further part of the conspiracy that each defendant agreed that a conspirator would commit at least two acts of racketeering activity in the conduct of the affairs of the enterprise.

Manner and Means of the Conspiracy

14. It was further part of the conspiracy that the defendants, as members of the Bloods gang, would regularly meet as required to discuss, among other things, past acts of violence and other crimes committed by Bloods gang members against rival gang members and others; to notify one another about gang members who were arrested or incarcerated; to discuss the

disciplining of Bloods gang members; to discuss police interactions with Bloods gang members; to share with one another the identities of individuals who may be cooperating with law enforcement and propose actions to be taken against those individuals; to plan and agree upon the commission of future crimes, including murders, assaults, robberies, and drug trafficking, and the means to cover up these crimes; and to reinforce gang rules.

15. It was further part of the conspiracy that the defendants and other members and associates of the Bloods gang maintained and circulated a collection of firearms for use in criminal activity by Bloods gang members.

16. It was further part of the conspiracy that the defendants and other members and associates of the Bloods gang distributed controlled substances, including cocaine, cocaine base, marijuana, and hydromorphone, and used the proceeds of those drug transactions to help finance the gang's illegal activities.

17. It was further part of the conspiracy that the defendants and other members and associates of the Bloods gang committed acts of attempted murder and murder, including the premeditated and intentional killing of another, and other acts of violence against rival gang members and others when it suited the enterprise's purposes, and also used violence to impose discipline within the Bloods gang.

18. It was further part of the conspiracy that the defendants and other members and associates of the Bloods gang were required to pay membership dues to the gang, a portion of which was in turn required to bond Bloods gang members out of jail, to pay for attorney's fees, and to finance the gang's illegal activities and to maintain the standing of the TTP and ESP sets of the Bloods gang in Nashville.

19. It was further part of the conspiracy that the defendants and other members and associates of the Bloods gang concealed their criminal activities and obstructed justice, including but not limited to, threatening witnesses, lying to law enforcement authorities, and receiving fraudulent documentation of court-ordered community service hours.

Overt Acts

20. In furtherance of the conspiracy and to achieve the objectives thereof, the conspirators performed and caused to be performed the following overt acts, among others, in the Middle District of Tennessee and elsewhere:

(1) On or about January 26, 2008, [29] **CEDRIC WOODS** and others, while evading arrest from law enforcement officers, possessed several firearms, to wit: a Colt, model Trooper MKIII, .22 caliber revolver, SN Y8940; a Browning, model HP, .380 caliber semi-automatic pistol, SN 74N26528; and a Mossberg, Model 500, pump-action 12 gauge shotgun, SN L044996.

(2) On or about February 1, 2008, [29] **CEDRIC WOODS** and others possessed several firearms, to wit: a Smith and Wesson, model 439, 9mm caliber semi-automatic pistol, SN A725916; a Glock, model 22, .40 caliber semi-automatic pistol, SN GVN156; and a Bersa, model Fire Storm, .45 caliber semi-automatic pistol, SN 705928.

(3) On or about February 2, 2008, [27] **KEAIRUS WILSON** and others possessed several firearms, to wit: a Taurus, .38 caliber revolver, SN TJ65226; a Norinco, .45 caliber semi-automatic pistol, SN 413726; and a Haskel JS, .45 caliber semi-automatic pistol, SN 017367.

(4) On or about May 23, 2008, [28] **MONTEZ HALL** possessed a firearm, to wit: a Charter Arms, model 38 special, .38 caliber pistol, SN 1095228.

(5) On or about June 14, 2008, [27] **KEAIRUS WILSON** shot and killed Michael Goins.

(6) On or about June 25, 2008, [32] **KENNETH GADDIE** shot and wounded a known individual.

(7) On or about July 17, 2008, [27] **KEAIRUS WILSON**, [32] **KENNETH GADDIE**, and others shot at a known individual.

(8) On or about July 18, 2008, [32] **KENNETH GADDIE** possessed five firearms, to wit: a Smith & Wesson, model 469, 9mm semi-automatic pistol, SN obliterated; a Bryco, model Jennings J-22, .22 caliber semi-automatic pistol, SN 436479; a Hi-Point, model CF380, .380 caliber semi-automatic pistol, SN P911967; a Mossberg, model 88, 12 gauge pump-action shotgun, SN MV78180M; and a Mossberg, model 88, 12 gauge pump-action shotgun, SN MV30365J. **GADDIE**'s cell phone contained a text message stating "put the guns up. I'll come by and get them later."

(9) On or about July 19, 2008, [27] **KEAIRUS WILSON**, [28] **MONTEZ HALL**, and [29] **CEDRIC WOODS** shot and killed Alexandra Franklin.

(10) On or about July 28, 2008, [28] **MONTEZ HALL** and others sold sixty (60) pills of hydromorphone, that is, dilaudid, to an undercover law enforcement officer.

(11) On or about August 27, 2008, Bloods gang members possessed a firearm, to wit: a Ruger, model P944, .40 caliber semi-automatic pistol, SN 340-65328.

(12) On or about September 2, 2008, [6] **ANTHONY LAMPKINS** possessed a stolen firearm, to wit: a Smith & Wesson, model unknown, .40 caliber semi-automatic pistol, SN PBZ9793.

(13) On October 21, 2008, [30] **RONDARIUS WILLIAMSON** possessed two stolen firearms.

(14) On or about October 30, 2008, [29] **CEDRIC WOODS** possessed 31.9 grams of crack cocaine and \$424.00 in U.S. currency.

(15) On or about December 20, 2008, [27] **KEAIRUS WILSON** assaulted a known individual in a gang-related incident at the Davidson County Jail.

(16) On or about February 9, 2009, [30] **RONDARIUS WILLIAMSON** shot and wounded a known individual.

(17) In and around April, 2009, Bloods gang members initiated Jermaine Coward by beating him for several minutes.

(18) On April 16, 2009, [27] **KEAIRUS WILSON** and [32] **KENNETH GADDIE** assaulted a known individual in a gang-related incident in a holding cell at the Davidson County courthouse. **WILSON** later told several individuals, "Fuck him, that's why I killed his bitch."

(19) On or about May 18, 2009, [30] **RONDARIUS WILLIAMSON** shot and killed Andreus Taylor.

(20) On or about June 24, 2009, [30] **RONDARIUS WILLIAMSON** possessed two firearms, to wit: a Smith and Wesson, model 65-G, .357 caliber semi-automatic

pistol, SN AFU3187; and a Smith and Wesson, model 5906, 9mm caliber semi-automatic pistol, SN TCZ9691.

(21) On or about July 9, 2009, [27] **KEAIRUS WILSON** assaulted a known individual in a gang-related incident at the Davidson County Jail.

(22) On or about July 10, 2009, [30] **RONDARIUS WILLIAMSON**, after being told that law enforcement was trying to implicate him in the Andreus Taylor murder, stated that “everyone needs to stick to the same story...we will get through this.”

(23) On or about July 28, 2009, Bloods gang members possessed firearms, to wit: a Mossberg, model 500A, 12 gauge pistol-grip pump action shotgun, SN J728608; and a Cobra Enterprises, model FS 380, .380 caliber semi-automatic pistol, SN obliterated.

(24) On or about August 27, 2009, [10] **DESHAUNE JONES** sold an ounce of crack cocaine to a known individual for \$1,050.00.

(25) On or about October 6, 2009, Karlos Taylor called to recruit a known individual to help him kill Corey Pickett, in retaliation for shooting him on June 18, 2009.

(26) On or about October 7, 2009, Karlos Taylor agreed that it was not a good idea to pursue his plans to kill Corey Pickett, and stated that he did not care what [1] **LONNIE NEWSOME** said about it.

(27) On or about October 7, 2009, in response to the conversation in the preceeding paragraph, [1] **LONNIE NEWSOME** stated “it’s too late for Karlos because he’d already been ‘x’ed off’ the hood.”

(28) On or about October 31, 2009, [30] **RONDARIUS WILLIAMSON** robbed and carjacked a known individual.

(29) On or about November 10, 2009, [29] **CEDRIC WOODS** and others assaulted a known individual.

(30) On or about December 2, 2009, [10] **DESHAUNE JONES** possessed 14.9 grams of crack cocaine.

(31) On or about December 6, 2009, there was a Bloods gang meeting at Galaxy Star Drug Awareness and Gang Prevention Center, which is operated by [1] **LONNIE NEWSOME**'s father, Lonnie Greenlee, during which time several individuals were initiated into the Bloods gang.

(32) On or about December 8, 2009, [30] **RONDARIUS WILLIAMSON** was involved in a gang-related altercation at the Davidson County Jail. [30] **WILLIAMSON** later stated "The GD's aint shit for that. I am a Blood."

(33) On or about January 10, 2010, there was a Bloods gang meeting behind [4] **TIM ALLEN**'s residence, during which time [4] **ALLEN** instructed Bloods gang members to sign a roll call book, to put in work in order to receive rank, to obtain firearms, and to attend meetings or be "xed off" the hood. Specifically, [4] **ALLEN** stated, "Like how we used to have meetings, Skyline and Tree Top...everybody needs to start gettin' some guns though...that's the only way to get yo rank put in some work...you gotta put in the work by yourself. ...that's how that shit go right there." Shortly thereafter, several individuals were initiated into the Bloods gang, while the crowd repeatedly shouted "Skyline!"

(34) On or about January 19, 2010, [10] **DESHAUNE JONES** received \$700 from a known individual for an outstanding drug debt.

(35) On or about February 2, 2010, [10] **DESHAUNE JONES** received \$500 from a known individual for an outstanding drug debt.

(36) On or about February 5, 2010, numerous Bloods gang members, including but not limited to [1] **LONNIE NEWSOME**, [6] **ANTHONY LAMPKINS**, [5] **ANTHONY BROOKS**, and others traveled to Chattanooga, Tennessee to meet with a known individual and to discuss the hierarchal structure of the Bloods gang.

(37) On or about February 11, 2010, [1] **LONNIE NEWSOME** and a known individual discussed an outstanding drug debt owed to [10] **DESHAUNE JONES**.

(38) On or about February 21, 2010, there was a Bloods gang meeting at Galaxy Star Drug Awareness and Gang Prevention Center, during which time members discussed retaliating against the Crips gang for robbing [5] **ANTHONY BROOKS**. During the meeting, an individual was assaulted by numerous Bloods gang members. Shortly thereafter, [5] **ANTHONY BROOKS** and other Bloods gang members, while armed with various firearms, traveled to Dodge City and shot and wounded two known individuals who were sitting in a vehicle at 2321 25th Avenue North, Nashville, Tennessee.

(39) On or about February 25, 2010, [10] **DESHAUNE JONES** received \$200 from a known individual for an outstanding drug debt.

(40) On or about February 28, 2010, at Cedar Hill Park in Madison, Tennessee, there was a Bloods gang meeting, during which several Bloods gang members were promoted and demoted, including Aaron Gooch.

(41) On or about March 4, 2010, [1] **LONNIE NEWSOME** agreed to have his father, Lonnie Greenlee, of Galaxy Star Drug Awareness and Gang Prevention Center, assist

Torey Cohen Boseman in the fraudulent certification of completing eight (8) hours of community service.

(42) On or about March 4, 2010, [1] **LONNIE NEWSOME** discussed his need for a “lick” with a known individual, whose cousin was recently arrested with “six ounces of powder.”

(43) On or about March 4, 2010, in a conversation with [5] **ANTHONY BROOKS**, [1] **LONNIE NEWSOME** stated that it’s “alright” for him to go to [1] **NEWSOME**’s residence to retrieve a .40 caliber firearm.

(44) On or about March 4, 2010, [1] **LONNIE NEWSOME** asked an unknown individual “what kind of lick you gonna hit?”

(45) On or about March 5, 2010, [1] **LONNIE NEWSOME** and Ricky Williams discussed a “lick.”

(46) On or about March 5, 2010, [1] **LONNIE NEWSOME** and an unknown individual agreed to rob a gambling house, which [1] **NEWSOME** described as an “easy one.” During the conversation, [1] **NEWSOME** asked, “Do they got straps in there?” and “They got cameras outside?”

(47) On or about March 5, 2010, Shayne Gibson sold three firearms, to wit: a Smith and Wesson, Model 625-8, .45 caliber revolver, SN CNM8070; a Smith and Wesson, Model 686-6, .357 caliber revolver, SN CNL8187; and a Norinco, Model SKS, 7.62x39mm caliber rifle, SN 1718634, to a known individual.

(48) On or about March 6, 2010, [1] **LONNIE NEWSOME** told Ricky Williams “Don’t forget about the meeting today.”

(49) On or about March 6, 2010, [1] **LONNIE NEWSOME** told an unknown individual to “come to Westchester, they moved the meeting.”

(50) On or about March 6, 2010, Donald Dowell called a joint meeting of the ESP and TTP sets of the Bloods gang, during which time [4] **TIM ALLEN** asked, “What happened at the last meeting; how did y’all take rank from the people that I gave rank to? [referring to the February 28, 2010, meeting where several Bloods gang members were demoted]...because they’ve been putting in work, y’all don’t know my little homies, I know my little homies.”

(51) On or about March 6, 2010, [1] **LONNIE NEWSOME** asked Rodney Britton of Galaxy Star Drug Awareness and Gang Prevention Center to fraudulently certify eight (8) hours of community service for Torey Cohen Boseman.

(52) On or about March 7, 2010, [1] **LONNIE NEWSOME** told Torey Cohen Boseman that he had “some paper for you too boy. . . . Yeah, my Dad and them called and told me that they had” completed Boseman’s fraudulent community service documentation.

(53) On or about March 7, 2010, a known individual told [1] **LONNIE NEWSOME** that he “just got done...catchin’ us a little money.”

(54) On or about March 7, 2010, Shayne Gibson discussed his outstanding debt with [1] **LONNIE NEWSOME**, who advised Gibson, “You supposed to go to Home Depot and steal stuff.”

(55) On or about March 7, 2010, [1] **LONNIE NEWSOME** asked [22] **BRANDON PRINCE** to “see if my [gun] holster in there.”

(56) On or about March 7, 2010, [1] **LONNIE NEWSOME** and

Donald Dowell discussed the importance of the Bloods gang members' footwear, and how they are not supposed to wear Adidas because it represents the Crips gang.

(57) On or about March 8, 2010, after departing the Strike and Spare Bowling Alley with three known individuals, [1] **LONNIE NEWSOME** drove away in his vehicle, while the three individuals drove away in a silver Pontiac. Shortly thereafter, [1] **NEWSOME** called the driver of the silver Pontiac, and informed her that "The police behind y'all." Shortly thereafter, the rear passenger, a known individual, called [1] **NEWSOME** and told him that the police stopped the car, and that they were "running our ID's." [1] **NEWSOME** then instructed the known individual to "put [the marijuana] in your shoe and step on it cause they gone search your nuts and shit. They ain't gone tell you to take your shoes off."

(58) On or about March 9, 2010, [1] **LONNIE NEWSOME** discussed the previous day's traffic stop of the silver Pontiac with the rear passenger, a known individual, who stated that his sister took possession of the marijuana. Moreover, [1] **NEWSOME** was concerned that the Metropolitan Nashville Police Department Gang Unit may have searched the known individual's cellular phone, and obtained photographs of firearms on his phone.

[1] **NEWSOME** told the sister not to worry about the charges because his father, Lonnie Greenlee, would take care of it. Specifically, [1] **NEWSOME** stated "the head gang unit car...was across the street...in the gold camry; I was looking right at him when I rode by. . . . did they see the pictures of the guns on his phone?. . . they ain't gonna give you no probation for that, they gonna throw it out...if they fuckin' give you community service...I can do that for you, cause my dad owns the company [referring to fraudulent community service documentation by Galaxy Star Drug Awareness and Gang Prevention Center]."

(59) On or about March 9, 2010, **[1] LONNIE NEWSOME** asked Rodney Britton of Galaxy Star Drug Awareness and Gang Prevention Center, “Did you ever do that paper? [referring to fraudulent community service documentation by Galaxy Star Drug Awareness and Gang Prevention Center].”

(60) On or about March 10, 2010, Kerry Pettus told **[1] LONNIE NEWSOME** that he needed a gun because he was in a dispute with Joedon Bradley. Specifically, Pettus stated “you got a heat for me? I need a heat man, Jo Jo talking that shit. I’m fixin’ to go in the third drive on his ass. I aint bullshittin’ He talk too much.”

(61) On or about March 10, 2010, in a three-way conversation with Ricky Williams and Donald Dowell regarding the dispute between Kerry Pettus and Joedon Bradley, **[1] LONNIE NEWSOME** stated “We done had this discussion. If anyone got a problem with Skyline...me and D-Dow and Rick...I keep telling him I’m gonna call Rick and D-Dow, ...so that’s why I was calling y’all.”

(62) On or about March 10, 2010, **[1] LONNIE NEWSOME** told Donald Dowell, **[5] ANTHONY BROOKS**, Ricky Williams, and Kerry Pettus to meet at his house at 3:15PM to discuss the dispute between Pettus and Joedon Bradley. After arriving at **[1] NEWSOME’s** residence, and while sitting beside **[5] ANTHONY BROOKS** near a stairwell of the “J” building at 860 Mufreesboro Road, Pettus reached into **[5] BROOKS’s** waistband and retrieved a pistol with an extended magazine. Pettus then placed the pistol into his waistband and covered it with his t-shirt before departing the location in a black Pontiac Grand Prix.

(63) On or about March 10, 2010, **[1] LONNIE NEWSOME** advised

Ricky Williams that the dispute between Joedon Bradley and Kerry Pettus was not resolved because the police arrived in the area.

(64) On or about March 10, 2010, Rodney Britton of Galaxy Star Drug Awareness and Gang Prevention Center asked [1] **LONNIE NEWSOME** if he charged Torey Cohen Boseman for the fraudulent documentation of community service hours.

(65) On or about March 10, 2010, Torey Cohen Boseman told [1] **LONNIE NEWSOME** that he appreciated his help with the fraudulent documentation of community service hours. [1] **NEWSOME** asked "What did Rodney [Britton] say before he gave it to you?" and Boseman responded "He just, he let me read the letter to make sure everything was cool though."

(66) On or about March 10, 2010, in a telephone call between an unknown individual and [1] **LONNIE NEWSOME**, the unknown individual stated "Treetop and Skyline is as one, we brothers so I had to send a message cause he ain't been coming to none of y'all meetings," to which [1] **NEWSOME** responded "I know, I know, I know but first of all by him not coming to meetings that ain't got nothing to do with you."

(67) On or about March 11, 2010, [1] **LONNIE NEWSOME** and Ricky Williams stole drug money from two known individuals near the Athlete's Foot retail store. [1] **NEWSOME** used \$3,000 of his portion of the proceeds to purchase a vehicle. Shortly thereafter, in a conversation with [5] **ANTHONY BROOKS**, [1] **NEWSOME** stated "Hey you know I got me one bitch. I got [the victims]. . . they meet me at Athlete's Foot, give me the money ...[for] the beans. They gave me the money and I didn't go back."

(68) On or about March 12, 2010, William Walden possessed two bags containing 4.5 grams of cocaine, a digital scale, and \$189.00 in U.S. currency.

(69) On or about March 14, 2010, Alonzo McLaurine told [1] **LONNIE NEWSOME** that he is “trying to go hit Lil’ Kenny. ...at TGI Friday’s in the parking lot,” and [1] **NEWSOME** replied “I don’t know, but you know they got cameras over there though.” In subsequent conversations between McLaurine and [1] **NEWSOME**, McLaurine discussed obtaining the .223 rifle to retaliate against Lil’ Kenny for shooting Tez’s mother, and if that firearm was not available, [1] **NEWSOME** stated “I got a gun you can use.”

(70) On or about March 14, 2010, [1] **LONNIE NEWSOME** discussed cocaine and marijuana with a known individual. Specifically, [1] **NEWSOME** stated “she talking about trying to find some white girl. She talking about some dope. . . . Cheese that motha hit a lick. Like 50 pounds of weed.”

(71) On or about March 15, 2010, Shayne Gibson and Jermaine Tate shot a firearm at several Crips gang members outside Club Nile in Nashville, Tennessee.

(72) On or about March 16, 2010, in a conversation with James House, [1] **LONNIE NEWSOME** discussed a possible drug-related theft, similar to the one he and Ricky Williams committed on March 11, 2010. Specifically, [1] **NEWSOME** stated that the potential victim has “1500 beans.”

(73) On or about March 16, 2010, an unknown individual told [1] **LONNIE NEWSOME** that he “just had to clap at your boy and them,” referring to shooting at two known individuals. The known individual then asked [1] **NEWSOME** “If you come up on some guns for sale, let me know, alright?” to which [1] **NEWSOME** responded “Alright.”

(74) On or about March 17, 2010, in a conversation between **[1] LONNIE NEWSOME** and others regarding Antonio Washington's refusal to fight another individual "one-on-one" without a gun, **[1] NEWSOME** stated "Tell him I got a gun license, I go out there with him."

(75) On or about March 19, 2010, **[10] DESHAUNE JONES** and Kerry Pettus shot and injured a known individual on 23rd Street. Specifically, **[10] JONES** told **[1] LONNIE NEWSOME** that he and Lil' Kerry "just hit some 23rd niggas."

(76) On or about March 19, 2010, **[1] LONNIE NEWSOME** told an unknown individual that he has "a lot of guns."

(77) On or about March 20, 2010, **[5] ANTHONY BROOKS** told **[1] LONNIE NEWSOME** that he "got to scuffling" with some Crips gang members at a club, and that "we followed the bitch and got to popping at him. ...I'm a kill that bitch...Fuck nine-eight [Crips] it's going down."

(78) On or about March 20, 2010, **[1] LONNIE NEWSOME** and Ricky Williams discussed plans for a possible home-invasion robbery of a known drug stash house. **[1] NEWSOME** stated "It don't matter to me. Whenever you want to do it."

(79) On or about March 20, 2010, Alonzo McLaurine asked **[1] LONNIE NEWSOME** to let him know if he sees Lil' Kenny.

(80) On or about March 22, 2010, **[1] LONNIE NEWSOME** and Jermaine Tate discussed robbing an unknown individual, and also burglarizing an apartment home located in the Skyline Apartments, so they can steal several flat-screen television sets. Jermaine Tate stated "she got a 64 in her living room and in her room she got a 32 and in her

mama room is a 32. . . . Need somebody strong to kick in the door. Like you. All we gotta do is just kick in the door, grab the TVs and dip,” to which [1] **NEWSOME** responded “We gonna need two cars.”

(81) On or about March 22, 2010, [1] **LONNIE NEWSOME** told Donald Dowell that he will bring the .38 caliber pistol to “the Spot.”

(82) On or about March 22, 2010, Alonzo McLaurine attempted to obtain rounds of .223 caliber ammunition from [1] **LONNIE NEWSOME**.

(83) On or about March 23, 2010, [6] **ANTHONY LAMPKINS** asked [1] **LONNIE NEWSOME** for help regarding twelve (12) hours of community service hours. Specifically, [6] **LAMPKINS** asked, “You don’t know nobody that can do me some community service hours?” [1] **NEWSOME** responded, “My daddy.” [6] **LAMPKINS** then asked, “What would he charge...[for] twelve hours?” and [1] **NEWSOME** responded, “Fifty dollars.”

(84) On or about March 24, 2010, Alonzo McLaurine and [1] **LONNIE NEWSOME** discussed an individual named “Lil’ Kenny,” who shot at Tez’s mother’s house. [1] **NEWSOME** stated, “I’m gonna try to find the bitch man,” to which McLaurine responded, “if you find him, call me.”

(85) On or about March 24, 2010, [1] **LONNIE NEWSOME** and [6] **ANTHONY LAMPKINS** discussed a robbery in Haynes Garden. Specifically, [1] **NEWSOME** asked, “Y’all need a strap or something,” to which [6] **LAMPKINS** responded, “Yeah.” [1] **NEWSOME** then replied, “I’m a let you know...so you can come and get your gun.”

(86) On or about March 25, 2010, [1] **LONNIE NEWSOME**, [6] **ANTHONY BROOKS**, Donald Dowell, and others agreed to “X-off” Joedon Bradley during the upcoming

Bloods gang meeting at Galaxy Star Drug Awareness and Gang Prevention Center. Specifically, Donald Dowell stated, "He talkin' 'bout fuck me and fuck everybody and he go hard by hisself and he don't need the line and all type a shit, you feel me, so that bitch be x'ed off. ...The hard way. No vaseline none of dat."

(87) On or about March 25, 2010, [1] **LONNIE NEWSOME** informed an unknown individual that he was at his cousin's house "breakin' some weed down."

(88) On or about March 26, 2010, [6] **ANTHONY LAMPKINS** and Ricky Williams discussed the individuals at the Haynes Garden Apartments who [6] **LAMPKINS** wanted to rob for \$20,000.00.

(89) On or about March 26, 2010, [1] **LONNIE NEWSOME** and Donald Dowell further discussed Joedon Bradley and their plans for dealing with his insubordination. Specifically, Dowell stated, "Yeah we gone have a trial and jury...we find him guilty, we're gonna X him on out...that's what I want to do right personally. We'll X him out. He ain't Skyline no more...we gonna pumpkin head him. I said it ain't gonna be no regular violation...I'm gonna get 7 or 8 niggas and...it's gonna be a real deal ass whooping, and we're taking his rank."

(90) On or about March 27, 2010, [1] **LONNIE NEWSOME** discussed a recent arrest of a known individual and the police questioning [1] **NEWSOME** regarding several firearms. [1] **NEWSOME** stated, "I went and got Doo Daddy's keys, and I got both his .40s with extended [clips] on there."

(91) On or about March 27, 2010, a known individual told

[1] **LONNIE NEWSOME** that “you got to keep pushing that goddamn Tree it’s some more shit I want to tell you man, I got some more information in shit history, is really, ...on the struggle and I got a book called ‘The Uprising Man’ it’s really on the homie’s for L.A. and Compton and south central [California], they talking about how it really started...whenever you ready to read it, I spit it at you.”

(92) On or about March 28, 2010, during a Bloods gang meeting at the Galaxy Star Drug Awareness and Gang Prevention Center, a large number of Bloods gang members, including but not limited to, [1] **LONNIE NEWSOME**, [5] **ANTHONY BROOKS**, and others assaulted Bloods gang member Joedon Bradley.

(93) On or about March 29, 2010, [1] **LONNIE NEWSOME**, Kerry Pettus, and Jermaine Tate discussed the previous assault on Joedon Bradley at the Galaxy Star Drug Awareness and Gang Prevention Center, and [1] **NEWSOME** stated “All I know is the bitch went to the hospital. He was throwing blood and shit, throwing up blood, and momma and them talking that shit and we about to kick their goddamn ass, that’s how I feel. ...I don’t feel sorry for nobody.”

(94) On or about March 29, 2010, [1] **LONNIE NEWSOME** and [5] **ANTHONY BROOKS** discussed a new meeting location because of William Walden’s disclosure of a previous gang meeting to individuals who were not Bloods gang members. Specifically, [5] **BROOKS** stated, “We just have to find us a little spot man, like a for real deal spot. That’s why I wish your daddy shop, that little spot right there was on the outskirts. ...If that motherfucker was outside the city wouldn’t nobody really know about that motherfucker; wouldn’t nobody be talking about that motherfucker like that you feel me?”

(95) On or about March 30, 2010, [1] **LONNIE NEWSOME**, [4] **TIM ALLEN**, Alonzo McLaurine, and Aaron Gooch agreed to kill Kenny Ellis. [1] **LONNIE NEWSOME**, who was in a vehicle with [22] **BRANDON PRINCE**, [23] **SHAWN HOWELL**, and Ricky Williams, conducting surveillance, told McLaurine, who was in a vehicle with [4] **TIM ALLEN** and Aaron Gooch, that “the bitch is right here. ...I can’t get him, I ain’t got no, I ain’t got another gun; I only got my gun,” referring to the firearm registered with his gun permit. [1] **NEWSOME** then told McLaurine that “Lil’ Kenny and Carlos...right here on 28th at the, inside the store...called Hang Time. ...Lil’ Kenny got on a red checker board...long sleeves. ...Lil’ Kenny right there; he’s by the truck, you see him?” Shortly thereafter, McLaurine arrived at the scene, and Gooch shot and wounded Kenny Ellis with a firearm.

(96) On or about March 31, 2010, [1] **LONNIE NEWSOME** warned several known individuals that law enforcement may be monitoring their phones.

(97) On or about April 1, 2010, [1] **LONNIE NEWSOME** agreed to provide firearm ammunition to various individuals to use against “them Mini Mouse niggas out South.”

(98) On or about April 1, 2010, [1] **LONNIE NEWSOME** told James House that “We about killed [Joedon Bradley’s] goddamn ass” during the assault at the Galaxy Star Drug Awareness and Gang Prevention Center on March 28, 2010.

(99) On or about April 2, 2010, [1] **LONNIE NEWSOME** discussed with a known individual the tattooing of twenty (20) to thirty (30) TTP Bloods gang members. Specifically, [1] **NEWSOME** stated “I got like thirty people they trying to get TTP on them.”

(100) On or about April 3, 2010, [6] **ANTHONY LAMPKINS** and others shot at several unknown individuals following a fight at club LAX.

(101) On or about April 3, 2010, Kerry Pettus, Ricky Williams, and an unknown individual discussed the acquisition of 4.5 ounces of cocaine for \$4,000.00. After being asked, “what you want to do...wholesale all of it for me, or you gonna’ let me piece it out...how much do I make on it if I piece it out?” Pettus responded “too goddamn much.”

(102) On or about April 4, 2010, a known individual told [1] **LONNIE NEWSOME** that he still needed twelve (12) hours of community service completed by Monday.

(103) On or about April 5, 2010, [1] **LONNIE NEWSOME** and Jermaine Tate discussed robbing [1] **NEWSOME’s** cousin.

(104) On or about April 5, 2010, [1] **LONNIE NEWSOME** and [5] **ANTHONY BROOKS** agreed to arrange a meeting with Karlos Taylor to pay for a quantity of “beans” and take Taylor’s money without providing the pills.

(105) On or about April 5, 2010, [5] **ANTHONY BROOKS** informed [6] **ANTHONY LAMPKINS** via [1] **NEWSOME’s** telephone that he wanted to conduct an inventory of the Bloods gang’s firearms. Specifically, [5] **BROOKS** stated, “y’all gotta get a clip from the gun and knife show. I need to see that chopper to see what kind of clip it is. My cousin got some clips, some extra clips. For some SKS and shit, you feel me. I wanna see those motherfuckers fit on that motherfucker. We get all, we need to get anything, all the stuff together, you feel me. You know what I mean, that way we know what we got and what we don’t got. We need...some more big shit, for real. We got enough handguns.”

(106) On or about April 5, 2010, Rodney Britton of Galaxy Star Drug Awareness and Gang Prevention Center asked [1] **LONNIE NEWSOME** if he had spoken to

[30] RONDARIUS WILLIAMSON because Britton wanted to put some money on his jail account.

(107) On or about April 5, 2010, Kerry Pettus, Antonio Washington, Ricky Williams, and an unknown individual discussed the acquisition of narcotics. Specifically, Washington stated "I want soft. I got five right now for, for half. ...Is you, is you gone bring it to me?"

(108) On or about April 6, 2010, Kerry Pettus and Ricky Williams discussed both powder and crack cocaine. Specifically, Pettus stated, "They can get it all brick, they two bricks all bricks at the house."

(109) On or about April 7, 2010, **[1] LONNIE NEWSOME** spoke to his father Lonnie Greenlee about acquiring some fraudulent community service hours for Joedon Bradley. **[1] NEWSOME** stated, "He said he would pay fifty dollars a day for eight hours a day," to which Greenlee responded, "He gone pay fifty dollars a day? Well you handle it then...Me and you will split the money every day."

(110) On or about April 8, 2010, **[1] LONNIE NEWSOME** and **[5] ANTHONY BROOKS** discussed the recent changes to the MNPd Gang Unit, and the need for the Bloods gang to change its strategies. Specifically, **[5] BROOKS** told **[1] NEWSOME** that "they talking about their little...gang members staying low key. Man, they saying all this shit in the paper, bro. Yeah so, we're going to adjust to they movement. I ain't bullshitting. Man, I ain't trusting a lot of shit after what they said. A nigga tipped them off...it's going down, it's time to move around, bro. We gotta come up with a little strategy."

(111) On or about April 9, 2010, a known individual and **[1] LONNIE NEWSOME** discussed the known individual's need for verification of community service hours. When the known individual told **[1] NEWSOME** that he was scheduled for court on Monday, **[1] NEWSOME** responded, "What you need the hours today for then?...Today Friday...It won't take but five minutes to do it...Text me...your first and last name and the hours."

(112) On or about April 9, 2010, an unknown individual asked **[1] LONNIE NEWSOME** if he had any firearms connections because he needed a firearm for the High School Prom. **[1] NEWSOME** responded "I'm gonna try to find you something."

(113) On or about April 10, 2010, a known individual asked **[1] LONNIE NEWSOME** "you go get that paper for me man?," [referring to fraudulent community service documentation by Galaxy Star Drug Awareness and Gang Prevention Center] to which **[1] NEWSOME** responded "I'm gonna do it later on."

(114) On or about April 10, 2010, **[1] LONNIE NEWSOME** informed Rodney Britton of Galaxy Star Drug Awareness and Gang Prevention Center, that there would not be a gang meeting on Sunday, and that a known individual would pay Britton for the community service paperwork.

(115) On or about April 10, 2010, **[10] DESHAUNE JONES** asked **[1] LONNIE NEWSOME** "What's AB number? I need my motherfucking strap. ...they said them Dodge City niggas supposed to be coming there to Fuel...I need my strap." **[1] NEWSOME** responded "You know you can't be killin, the police gonna be everywhere in that motherfucker," and **[10] JONES** replied "I know, that's why I'm tryin' to catch their ass at

the club. ...last time we caught the niggas down there, we could have killed their ass. ...Ask Doo Daddy.”

(116) On or about April 10, 2010, [32] **KENNETH GADDIE** told [4] **TIM ALLEN** “I’m trying to come home in a couple of months man, about sixty days or something though. But what’s going on out there, out there with the hood boy, you need to kill that beef bro, with the, with the Trees man.”

(117) On or about April 11, 2010, [4] **TIM ALLEN** told Ricky Williams that he was “Just runnin’ from the police. Had to throw my motherfuckin’ pack, and now I can’t find it. ...They see me catchin a sale. ... I ain’t got nothin’ but goddammit thirty dollars. I just threw a whole quarter.”

(118) On or about April 11, 2010, [27] **KEAIRUS WILSON** wrote a letter from jail to Ricky Williams. Specifically, **WILSON** stated “You know I been holding the line down bra. These krip niggas aint...nothin’ they just thick that’s all, especially them [five-deuce] niggas they comin’ from everywhere now it’s like 5 to every pod except for ours it’s just 2 krips on our pod [and] that’s Lil’ Woo the nigga that used to B around Scoota, we B goin hard on everybody in the pod. ...Ima tell my little homie to save up like 2 stacks so he kan get that (I-65) you know what I’m talkin bout. You just get him some lil’ ducks to feed [and] he gone take it from there.”

(119) On or about April 13, 2010, [1] **LONNIE NEWSOME** and Rodney Britton of Galaxy Star Drug Awareness and Gang Prevention Center provided a known individual with a fraudulent certification of completing community service hours.

(120) On or about April 14, 2010, Antonio Washington, Alonzo McLaurine, Ricky Williams, and James House agreed to rob an unknown individual of approximately thirty

(30) pounds of marijuana. House stated "I know a nigga' right now runnin' around with about thirty pounds in his truck...You know the fat nigga named T-Baby?...he still parked right there." When Williams asked Washington if he had a gun, Washington responded "I can get...the one at Montey's house." Shortly thereafter, house informed Washington, McLaurine, and Williams that the "Police just bum rushed...the whole shop up there."

(121) On or about April 16, 2010, Kerry Pettus and Ricky Williams discussed an unidentified Mexican marijuana supplier. Specifically, Pettus stated "so I'm sitting in the truck, they made us...turn all our phones off and take the battery out...I was like, what the fuck is the Mexican's doing out here in the hood?"

(122) On or about April 17, 2010, Donald Dowell told [1] LONNIE NEWSOME "That nigga Courtney bought me a gun yesterday too...man you need to see that motherfucker...that little motherfucker...it's a little ass .380."

(123) On or about April 18, 2010, Lonnie Greenlee called his son [1] LONNIE NEWSOME and advised him that the police were at the "spot," [referring to the Galaxy Star Drug Awareness and Gang Prevention Center]. Greenlee warned [1] NEWSOME that someone in the neighborhood had notified the police that there was gang activity occurring at the center. Specifically, Greenlee stated "they got a report that there's a bunch of gang activity down here at two o'clock. Goddamn it pissed me off. ...just calling to let you know now."

(124) On or about April 20, 2010, Kerry Pettus and Ricky Williams discussed the purchase of one kilogram of cocaine. Pettus stated "I was gonna get a whole and just give you a nine out of it...if you want me to get it all for you, and then just give you money, we could

do it like that...but I rather you just let me do it, that way you can make more money and I can make more money.”

(125) On or about May 4, 2010, Ricky Williams told Kerry Pettus “I’m finna go buy me like two singles and get you to whip it for me.”

(126) On or about May 6, 2010, [1] **LONNIE NEWSOME** and Ricky Williams discussed a robbery. Later in the conversation, Williams informed [1] **NEWSOME** that he has Scooter’s “paperwork,” to which [1] **NEWSOME** responded, “That bitch snitchin’?”

(127) On or about May 6, 2010, [1] **LONNIE NEWSOME** advised an unknown individual that if “you talk to anybody from jail, hell the Police listen to them conversations. Callin from jail, why they ain’t gonna listen on the line, all that shit recorded. . . . That’s why I never talk on the phone.”

(128) On or about May 6, 2010, Karlos Taylor attempted to borrow \$300.00 from [1] **LONNIE NEWSOME** in order to purchase a firearm.

(129) On or about May 10, 2010, a known individual asked [1] **LONNIE NEWSOME** for the contact information of a person who could help him distribute “a little QP for like three pennies.” [1] **NEWSOME** then stated, “Ahh, you trying to rob him or something bitch?”

(130) On or about May 10, 2010, Ricky Williams told Aaron Gooch “Don’t talk about your case on the phone you hear me? . . they gonna have to pay you for shootin’ you.”

(131) On or about May 22, 2010, [1] **LONNIE NEWSOME**,

Donald Dowell, and Jermaine Tate discussed whether or not the ESP set of the Bloods gang is supposed to wear green, and Dowell stated “green is a Linkin Park color and we bang on Linkin Park before we bang on the Crips so we don’t wear green.”

(132) On or about May 22, 2010, [1] **LONNIE NEWSOME** and a known individual discussed the March 28, 2010 violation of Joedon Bradley at the Galaxy Star Drug Awareness and Gang Prevention Center. Specifically, [1] **NEWSOME** stated that “we had a meeting . . . and x’d him off.” [1] **NEWSOME** further stated “When you getting violated, you ain’t a part of this family.”

(133) On or about May 22, 2010, [1] **LONNIE NEWSOME** asked [5] **ANTHONY BROOKS** if he could get “two of them [beans].”

(134) On or about May 22, 2010, [1] **LONNIE NEWSOME** called his father Lonnie Greenlee, and said “I got some of my homeboys down from Chattanooga . . . and we trying to go to the spot and talk about something,” to which Greenlee responded “Y’all can go out there [by] that little fence part back there.” [referring to the Galaxy Star Drug Awareness and Gang Prevention Center].

(135) On or about May 24, 2010, [1] **LONNIE NEWSOME** stated “We gonna get them 23rd bitches...we gonna get ‘em in the club Saturday.”

(136) On or about May 26, 2010, Ricky Williams stated that [1] **LONNIE NEWSOME** needed to be more careful or else “Lonnie’s ass going to end up in the fed book. They going to be telling a story about his ass. He better quit playing.”

(137) On or about May 26, 2010, [1] **LONNIE NEWSOME** spoke to a known individual about purchasing some marijuana for a graduation gift. [1] **NEWSOME** stated “somebody graduating. I thought I’d give him some weed.” In a subsequent conversation with

an unknown individual, who called **[1] NEWSOME** and acknowledged that the police arrested him and seized the marijuana, **[1] NEWSOME** responded that he is “cryin’ like a goddamn bitch” and not to worry because it “ain’t no felony. It be alright man. Ain’t but some weed.”

(138) On or about May 27, 2010, Kerry Pettus possessed two ounces of crack cocaine and \$924.00 in cash.

(139) On or about May 27, 2010, Kerry Pettus told Ricky Williams that “I got pulled over at Café Bella, bro...I got caught with two zips.” Williams then told Pettus that the other male in the vehicle needed to take the charge because Pettus was on probation. Pettus stated “I think they gonna try some slick shit even if he try to take it though” because the crack cocaine was “all over the goddamn car.”

(140) On or about May 29, 2010, **[4] TIM ALLEN** and Ricky Williams discussed gang issues. Specifically, Ricky Williams told **[4] ALLEN** “when [Robert Osborne] and [Tim Beach] got into it we ain’t had a meeting since you feel me? ...a lot of the shit that [Robert Osborne] gave us was wrong, you feel me? ...eventually a nigga’s gone strip his motherfuckin’ ass in that pen.” **[4] ALLEN** then responded “I’m on Face Mob’s account.”

(141) On or about June 1, 2010, Joedon Bradley shot at several individuals.

(142) On or about June 3, 2010, William Walden possessed a firearm, to wit: a Glock 17, 9mm semi-automatic firearm, SN MRH189.

(143) On or about September 4, 2010, **[27] KEAIRUS WILSON** assaulted a known individual in a gang-related incident at the Davidson County Jail.

(144) On or about January 2, 2011, **[32] KENNETH GADDIE** shot and wounded three known individuals at Silverado’s nightclub in Nashville, Tennessee.

(145) On or about January 9, 2011, [32] **KENNETH GADDIE** shot and damaged an occupied residence located at 1537 Brick Drive, Nashville, Tennessee.

All in violation of Title 18, United States Code, Section 1962(d).

COUNT TWO
(Murder in Aid of Racketeering)

The Grand Jury Further Charges:

21. The allegations of Paragraphs 1-11 and 14-19 are hereby re-alleged and incorporated as if fully set forth herein.

22. At all times relevant to this Superseding Indictment, the Bloods gang, as more fully described in Paragraphs 1-11 of Count One of this Superseding Indictment, which are realleged and incorporated by reference as though fully set forth herein, constituted an enterprise as defined in Title 18, United States Code, Section 1959(b)(2), namely the Bloods gang, that is, a group of individuals associated in fact which was engaged in, and the activities of which affected, interstate and foreign commerce. The enterprise constituted an ongoing organization whose members functioned as a continuing unit for a common purpose of achieving the objectives of the enterprise.

23. At all times relevant to this Superseding Indictment, the above-described enterprise, through its members and associates, engaged in racketeering activity as defined in Title 18, United States Code, Sections 1959(b)(1) and 1961(1), namely, acts involving murder, robbery, bribery, extortion, and distribution of controlled substances, in violation of the laws of the State of Tennessee; narcotics trafficking in violation of Title 21, United States Code, Sections 841 and 846; and acts indictable under 1951 (robbery and extortion), of Title 18, United States Code.

24. On or about June 14, 2008, in the Middle District of Tennessee, the defendant [27] **KEAIRUS WILSON, a/k/a “Key-Thang,”** and others known and unknown to the Grand Jury, for the purpose of maintaining and increasing their positions in the Bloods gang, an enterprise engaged in racketeering activity, did murder Michael Goins, in violation of the laws of the State of Tennessee, that is Tennessee Code Annotated Sections 39-13-201, 39-13-202, 39-11-401, and 39-11-402.

All in violation of Title 18, United States Code, Sections 1959(a)(1) and 2.

COUNT THREE
(Use and Carrying of Firearm During and in Relation to a Crime of Violence)

The Grand Jury Further Charges:

25. The allegations of Paragraphs 1-11, 14-19, and 22-23 are hereby re-alleged and incorporated as if fully set forth herein.

26. On or about June 14, 2008, in the Middle District of Tennessee, the defendant **[27] KEAIRUS WILSON, a/k/a "Key-Thang,"** and others known and unknown to the Grand Jury, did knowingly use and carry a firearm during and in relation to, and possess a firearm in furtherance of, a crime of violence for which they may be prosecuted in a court of the United States, to wit, murder in aid of racketeering, as set forth in Count Two of this Superseding Indictment, which is incorporated here.

All in violation of Title 18, United States Code, Sections 924(c) and 2.

COUNT FOUR
(Murder Resulting From the Use and Carrying of Firearm
During and in Relation to a Crime of Violence)

The Grand Jury Further Charges:

27. The allegations of Paragraphs 1-11, 14-19, and 22-23 are hereby re-alleged and incorporated as if fully set forth herein.

28. On or about June 14, 2008, in the Middle District of Tennessee, the defendant **[27] KEAIRUS WILSON, a/k/a “Key-Thang,”** and others known and unknown to the Grand Jury, in the course of committing a violation of 18 U.S.C. § 924(c) as set forth in Count Three of this Superseding Indictment, which is incorporated here, did cause the death of a person through the use of a firearm, which killing is a murder as defined in 18 U.S.C. § 1111, in that the defendant, with malice aforethought, unlawfully killed a human being, to wit, Michael Goins, willfully, deliberately, maliciously and with premeditation.

All in violation of Title 18, United States Code, Sections 924(j) and 2.

COUNT FIVE
(Use and Carrying of Firearm During and in Relation to a Crime of Violence)

The Grand Jury Further Charges:

29. The allegations of Paragraphs 1-11, 14-19, and 22-23 are hereby re-alleged and incorporated as if fully set forth herein.

30. On or about July 17, 2008, in the Middle District of Tennessee, the defendants **[27] KEAIRUS WILSON, a/k/a "Key-Thang," [32] KENNETH GADDIE, a/k/a "K.G.,"** and others known and unknown to the Grand Jury, did knowingly use and carry a firearm during and in relation to, and possess a firearm in furtherance of, a crime of violence for which they may be prosecuted in a court of the United States, to wit, assault with a dangerous weapon in aid of racketeering, in violation of 18 U.S.C. § 1959(a)(3), as set forth in Overt Act 7 of Count One of this Superseding Indictment, which is incorporated here.

All in violation of Title 18, United States Code, Sections 924(c) and 2.

COUNT SIX
(Murder in Aid of Racketeering)

The Grand Jury Further Charges:

31. The allegations of Paragraphs 1-11, 14-19, and 22-23 are hereby re-alleged and incorporated as if fully set forth herein.

32. On or about July 19, 2008, in the Middle District of Tennessee, the defendants [27] KEAIRUS WILSON, a/k/a "Key-Thang," [28] MONTEZ HALL, a/k/a "Tez," and [29] CEDRIC WOODS, a/k/a "Lil' Ced," and others known and unknown to the Grand Jury, for the purpose of maintaining and increasing their positions in the Bloods gang, an enterprise engaged in racketeering activity, did murder Alexandra Franklin, in violation of the laws of the State of Tennessee, that is Tennessee Code Annotated Sections 39-13-201, 39-13-202, 39-11-401, and 39-11-402.

All in violation of Title 18, United States Code, Sections 1959(a)(1) and 2.

COUNT SEVEN

(Use and Carrying of Firearm During and in Relation to a Crime of Violence)

The Grand Jury Further Charges:

33. The allegations of Paragraphs 1-11, 14-19, and 22-23 are hereby re-alleged and incorporated as if fully set forth herein.

34. On or about July 19, 2008, in the Middle District of Tennessee, the defendants [27] KEAIRUS WILSON, a/k/a "Key-Thang," [28] MONTEZ HALL, a/k/a "Tez," and [29] CEDRIC WOODS, a/k/a "Lil' Ced," and others known and unknown to the Grand Jury, did knowingly use and carry a firearm during and in relation to, and possess a firearm in furtherance of, a crime of violence for which they may be prosecuted in a court of the United States, to wit, murder in aid of racketeering, as set forth in Count Six of this Superseding Indictment, which is incorporated here.

All in violation of Title 18, United States Code, Sections 924(c) and 2.

COUNT EIGHT
(Murder Resulting From the Use and Carrying of Firearm
During and in Relation to a Crime of Violence)

The Grand Jury Further Charges:

35. The allegations of Paragraphs 1-11, 14-19, and 22-23 are hereby re-alleged and incorporated as if fully set forth herein.

36. On or about July 19, 2008, in the Middle District of Tennessee, the defendants [27] KEAIRUS WILSON, a/k/a “Key-Thang,” [28] MONTEZ HALL, a/k/a “Tez,” and [29] CEDRIC WOODS, a/k/a “Lil’ Ced,” and others known and unknown to the Grand Jury, in the course of committing a violation of 18 U.S.C. § 924(c) as set forth in Count Seven of this Superseding Indictment, which is incorporated here, did cause the death of a person through the use of a firearm, which killing is a murder as defined in 18 U.S.C. § 1111, in that the defendants, with malice aforethought, unlawfully killed a human being, to wit, Alexandra Franklin, willfully, deliberately, maliciously and with premeditation

All in violation of Title 18, United States Code, Sections 924(j) and 2.

COUNT NINE
(Possession with Intent to Distribute Cocaine Base)

The Grand Jury Further Charges:

37. The allegations of Paragraphs 1-11, 14-19, and 22-23 are hereby re-alleged and incorporated as if fully set forth herein.

38. On or about October 30, 2008, in the Middle District of Tennessee, the defendant **[29] CEDRIC WOODS, a/k/a "Lil' Ced,"** did knowingly and intentionally possess with intent to distribute 28 grams and more, but less than 280 grams, of a mixture and substance containing a detectable amount of cocaine base, that is, crack cocaine, a schedule II controlled substance.

All in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(B), and Title 18, United States Code, Section 2.

COUNT TEN
(Use and Carrying of Firearm During and in Relation to a Crime of Violence)

The Grand Jury Further Charges:

39. The allegations of Paragraphs 1-11, 14-19, and 22-23 are hereby re-alleged and incorporated as if fully set forth herein.

40. On or about February 9, 2009, in the Middle District of Tennessee, the defendant **[30] RONDARIUS WILLIAMSON, a/k/a "Killa,"** and others known and unknown to the Grand Jury, did knowingly use and carry a firearm during and in relation to, and possess a firearm in furtherance of, a crime of violence for which they may be prosecuted in a court of the United States, to wit, assault with a dangerous weapon in aid of racketeering, in violation of 18 U.S.C. § 1959(a)(3), as set forth in Overt Act 16 of Count One of this Superseding Indictment, which is incorporated here.

All in violation of Title 18, United States Code, Sections 924(c) and 2.

COUNT ELEVEN
(Murder in Aid of Racketeering)

The Grand Jury Further Charges:

41. The allegations of Paragraphs 1-11, 14-19, and 22-23 are hereby re-alleged and incorporated as if fully set forth herein.

42. On or about May 18, 2009, in the Middle District of Tennessee, the defendant **[30] RONDARIUS WILLIAMSON, a/k/a "Killa,"** and others known and unknown to the Grand Jury, for the purpose of maintaining and increasing their positions in the Bloods gang, an enterprise engaged in racketeering activity, did murder Andreus Taylor, in violation of the laws of the State of Tennessee, that is Tennessee Code Annotated Sections 39-13-201, 39-13-202, 39-11-401, and 39-11-402.

All in violation of Title 18, United States Code, Sections 1959(a)(1) and 2.

COUNT TWELVE
(Use and Carrying of Firearm During and in Relation to a Crime of Violence)

The Grand Jury Further Charges:

43. The allegations of Paragraphs 1-11, 14-19, and 22-23 are hereby re-alleged and incorporated as if fully set forth herein.

44. On or about May 18, 2009, in the Middle District of Tennessee, the defendant **[30] RONDARIUS WILLIAMSON, a/k/a "Killa,"** and others known and unknown to the Grand Jury, did knowingly use and carry a firearm during and in relation to, and possess a firearm in furtherance of, a crime of violence for which they may be prosecuted in a court of the United States, to wit, murder in aid of racketeering, as set forth in Count Eleven of this Superseding Indictment, which is incorporated here.

All in violation of Title 18, United States Code, Sections 924(c) and 2.

COUNT THIRTEEN
(Murder Resulting From the Use and Carrying of Firearm
During and in Relation to a Crime of Violence)

The Grand Jury Further Charges:

45. The allegations of Paragraphs 1-11, 14-19, and 22-23 are hereby re-alleged and incorporated as if fully set forth herein.

46. On or about May 18, 2009, in the Middle District of Tennessee, the defendant **[30] RONDARIUS WILLIAMSON, a/k/a "Killa,"** and others known and unknown to the Grand Jury, in the course of committing a violation of 18 U.S.C. § 924(c) as set forth in Count Twelve of this Superseding Indictment, which is incorporated here, did cause the death of a person through the use of a firearm, which killing is a murder as defined in 18 U.S.C. § 1111, in that the defendant, with malice aforethought, unlawfully killed a human being, to wit, Andreus Taylor, willfully, deliberately, maliciously and with premeditation.

All in violation of Title 18, United States Code, Sections 924(j) and 2.

COUNT FOURTEEN
(Distribution and Possession with Intent to Distribute Cocaine Base)

The Grand Jury Further Charges:

47. The allegations of Paragraphs 1-11, 14-19, and 22-23 are hereby re-alleged and incorporated as if fully set forth herein.

48. On or about August 27, 2009, in the Middle District of Tennessee, the defendant **[10] DESHAUNE JONES, a/k/a "Mexico,"** did knowingly and intentionally distribute and possess with intent to distribute less than 28 grams of a mixture and substance containing a detectable amount of cocaine base, that is, crack cocaine, a schedule II controlled substance.

All in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(C), and Title 18, United States Code, Section 2.

COUNT FIFTEEN
(Use and Carrying of Firearm During and in Relation to a Crime of Violence)

The Grand Jury Further Charges:

49. The allegations of Paragraphs 1-11, 14-19, and 22-23 are hereby re-alleged and incorporated as if fully set forth herein.

50. On or about October 31, 2009, in the Middle District of Tennessee, the defendant **[30] RONDARIUS WILLIAMSON, a/k/a "Killa,"** and others known and unknown to the Grand Jury, did knowingly use and carry a firearm during and in relation to, and possess a firearm in furtherance of, a crime of violence for which they may be prosecuted in a court of the United States, to wit, robbery and carjacking, in violation of 18 U.S.C. §§ 1951 and 2119, as set forth in Overt Act 28 of Count One of this Superseding Indictment, which is incorporated here.

All in violation of Title 18, United States Code, Sections 924(c) and 2.

COUNT SIXTEEN
(Use and Carrying of Firearm During and in Relation to a Drug Trafficking Crime)

The Grand Jury Further Charges:

51. The allegations of Paragraphs 1-11, 14-19, and 22-23 are hereby re-alleged and incorporated as if fully set forth herein.

52. On or about November 10, 2009, in the Middle District of Tennessee, the defendant [29] **CEDRIC WOODS, a/k/a "Lil' Ced,"** and others known and unknown to the Grand Jury, did knowingly use and carry a firearm during and in relation to, and possess a firearm in furtherance of, a drug trafficking crime for which they may be prosecuted in a court of the United States, to wit, conspiracy to distribute narcotics, as set forth in Count Twenty-Eight of this Superseding Indictment, which is incorporated here.

All in violation of Title 18, United States Code, Sections 924(c) and 2.

COUNT SEVENTEEN
(Conspiracy to Commit Murder in Aid of Racketeering)

The Grand Jury Further Charges:

53. The allegations of Paragraphs 1-11, 14-19, and 22-23 are hereby re-alleged and incorporated as if fully set forth herein.

54. On or about February 21, 2010, in the Middle District of Tennessee, the defendants [1] **LONNIE NEWSOME, a/k/a “Big Lonnie,”** [5] **ANTHONY BROOKS, a/k/a “A.B.,”** and others known and unknown to the Grand Jury, for the purpose of maintaining and increasing their positions in the Bloods gang, an enterprise engaged in racketeering activity, did conspire to murder any and all suspected Crips gang members in and around Nashville, Tennessee, in violation of the laws of the State of Tennessee, Tennessee Code Annotated Sections 39-12-103, 39-13-201, 39-13-202, 39-11-401, and 39-11-402.

All in violation of Title 18, United States Code, Section 1959(a)(5).

COUNT EIGHTEEN
(Assault with a Dangerous Weapon in Aid of Racketeering)

The Grand Jury Further Charges:

55. The allegations of Paragraphs 1-11, 14-19, and 22-23 are hereby re-alleged and incorporated as if fully set forth herein.

56. On or about February 21, 2010, in the Middle District of Tennessee, the defendants [1] LONNIE NEWSOME, a/k/a “Big Lonnie,” [5] ANTHONY BROOKS, a/k/a “A.B.,” and others known and unknown to the Grand Jury, for the purpose of maintaining and increasing their positions in the Bloods gang, an enterprise engaged in racketeering activity, did assault with a dangerous weapon two known individuals, in violation of the laws of the State of Tennessee, that is Tennessee Code Annotated Sections 39-13-101, 39-13-102(a)(1)(B), 39-11-401, and 39-11-402.

All in violation of Title 18, United States Code, Sections 1959(a)(3) and 2.

COUNT NINETEEN
(Use and Carrying of Firearm During and in Relation to a Crime of Violence)

The Grand Jury Further Charges:

57. The allegations of Paragraphs 1-11, 14-19, and 22-23 are hereby re-alleged and incorporated as if fully set forth herein.

58. On or about February 21, 2010, in the Middle District of Tennessee, the defendants [1] LONNIE NEWSOME, a/k/a “Big Lonnie,” [5] ANTHONY BROOKS, a/k/a “A.B.,” and others known and unknown to the Grand Jury, did knowingly use and carry firearms during and in relation to, and possess firearms in furtherance of, a crime of violence for which they may be prosecuted in a court of the United States, to wit, conspiracy to commit murder in aid of racketeering and assault with a dangerous weapon in aid of racketeering, as set forth in Counts Seventeen and Eighteen of this Superseding Indictment, which is incorporated here.

All in violation of Title 18, United States Code, Sections 924(c) and 2.

COUNT TWENTY
(Possession of a Firearm in Furtherance of a Crime of Violence)

The Grand Jury Further Charges:

59. The allegations of Paragraphs 1-11, 14-19, and 22-23 are hereby re-alleged and incorporated as if fully set forth herein.

60. On or about March 10, 2010, in the Middle District of Tennessee, the defendant [5] **ANTHONY BROOKS, a/k/a "A.B."** and others known and unknown to the Grand Jury, did knowingly use and carry a firearm during and in relation to, and possess a firearm in furtherance of, a crime of violence for which they may be prosecuted in a court of the United States, to wit, conspiracy to commit murder in aid of racketeering, in violation of 18 U.S.C. § 1959(a)(5), as set forth in Overt Acts 60-63 of Count One of this Superseding Indictment, which is incorporated here.

All in violation of Title 18, United States Code, Sections 924(c) and 2.

COUNT TWENTY-ONE
(Assault with a Dangerous Weapon in Aid of Racketeering)

The Grand Jury Further Charges:

61. The allegations of Paragraphs 1-11, 14-19, and 22-23 are hereby re-alleged and incorporated as if fully set forth herein.

62. On or about March 19, 2010, in the Middle District of Tennessee, the defendant **[10] DESHAUNE JONES, a/k/a "Mexico,"** and others known and unknown to the Grand Jury, for the purpose of maintaining and increasing their positions in the Bloods gang, an enterprise engaged in racketeering activity, did assault with a dangerous weapon a known individual, in violation of the laws of the State of Tennessee, that is Tennessee Code Annotated Sections 39-13-101, 39-13-102(a)(1)(B), 39-11-401, and 39-11-402.

All in violation of Title 18, United States Code, Sections 1959(a)(3) and 2.

COUNT TWENTY-TWO
(Use and Carrying of Firearm During and in Relation to a Crime of Violence)

The Grand Jury Further Charges:

63. The allegations of Paragraphs 1-11, 14-19, and 22-23 are hereby re-alleged and incorporated as if fully set forth herein.

64. On or about March 19, 2010, in the Middle District of Tennessee, the defendant **[10] DESHAUNE JONES, a/k/a “Mexico”** and others known and unknown to the Grand Jury, did knowingly use and carry a firearm during and in relation to, and possess a firearm in furtherance of, a crime of violence for which they may be prosecuted in a court of the United States, to wit, assault with a dangerous weapon in aid of racketeering, as set forth in Count Twenty-One of this Superseding Indictment, which is incorporated here.

All in violation of Title 18, United States Code, Sections 924(c) and 2.

COUNT TWENTY-THREE
(Assault Resulting in Serious Bodily Injury in Aid of Racketeering)

The Grand Jury Further Charges:

65. The allegations of Paragraphs 1-11, 14-19, and 22-23 are hereby re-alleged and incorporated as if fully set forth herein.

66. On or about March 28, 2010, in the Middle District of Tennessee, the defendants **[1] LONNIE NEWSOME, a/k/a “Big Lonnie,” [5] ANTHONY BROOKS, a/k/a “A.B.,”** and others known and unknown to the Grand Jury, for the purpose of maintaining and increasing their positions in the Bloods gang, an enterprise engaged in racketeering activity, did commit an assault resulting in serious bodily injury against Joedon Bradley, in violation of the laws of the State of Tennessee, that is Tennessee Code Annotated Sections 39-13-101, 39-13-102(a)(1)(A), 39-11-401, and 39-11-402.

All in violation of Title 18, United States Code, Sections 1959(a)(3) and 2.

COUNT TWENTY-FOUR
(Assault with a Dangerous Weapon in Aid of Racketeering)

The Grand Jury Further Charges:

67. The allegations of Paragraphs 1-11, 14-19, and 22-23 are hereby re-alleged and incorporated as if fully set forth herein.

68. On or about March 30, 2010, in the Middle District of Tennessee, the defendants [1] LONNIE NEWSOME, a/k/a “Big Lonnie,” [4] TIM ALLEN, a/k/a “Lil Tim,” and others known and unknown to the Grand Jury, for the purpose of maintaining and increasing their positions in the Bloods gang, an enterprise engaged in racketeering activity, did assault with a dangerous weapon Kenny Ellis, in violation of the laws of the State of Tennessee, that is Tennessee Code Annotated Sections 39-13-101, 39-13-102(a)(1)(B), 39-11-401, and 39-11-402.

All in violation of Title 18, United States Code, Sections 1959(a)(3) and 2.

COUNT TWENTY-FIVE

(Use and Carrying of Firearm During and in Relation to a Crime of Violence)

The Grand Jury Further Charges:

69. The allegations of Paragraphs 1-11, 14-19, and 22-23 are hereby re-alleged and incorporated as if fully set forth herein.

70. On or about March 30, 2010, in the Middle District of Tennessee, the defendants [1] LONNIE NEWSOME, a/k/a "Big Lonnie," [4] TIM ALLEN, a/k/a "Lil Tim," and others known and unknown to the Grand Jury, did knowingly use and carry a firearm during and in relation to, and possess a firearm in furtherance of, a crime of violence for which they may be prosecuted in a court of the United States, to wit, assault with a dangerous weapon in aid of racketeering, as set forth in Count Twenty-Four of this Superseding Indictment, which is incorporated here.

All in violation of Title 18, United States Code, Sections 924(c) and 2.

COUNT TWENTY-SIX
(Misprision of a Felony)

The Grand Jury Further Charges:

71. The allegations of Paragraphs 1-11, 14-19, and 22-23 are hereby re-alleged and incorporated as if fully set forth herein.

72. On or about March 30, 2010, in the Middle District of Tennessee, the defendants **[22] BRANDON PRINCE** and **[23] SHAWN HOWELL**, and others known and unknown to the Grand Jury, having knowledge of the actual commission of a felony cognizable by a court of the United States, to wit, conspiracy to commit murder in aid of racketeering, assault with a dangerous weapon in aid of racketeering, and using and carrying a firearm during and in relation to a crime of violence, did conceal the same by lying to law enforcement officers regarding the shooting incident between Aaron Gooch and Kenny Ellis, and did not as soon as possible make known the felony to some judge and other person in civil and military authority under the United States.

All in violation of Title 18, United States Code, Section 4.

COUNT TWENTY-SEVEN

(Conspiracy to Use and Carry Firearms During and in Relation to Crimes of Violence)

The Grand Jury Further Charges:

73. The allegations of Paragraphs 1-11, 14-19, and 22-23 are hereby re-alleged and incorporated as if fully set forth herein.

74. From in and around 2006 and continuing through on or about January 2011, in the Middle District of Tennessee, the defendants [1] LONNIE NEWSOME, a/k/a "Big Lonnie," [4] TIM ALLEN, a/k/a "Lil Tim," [5] ANTHONY BROOKS, a/k/a "A.B.," [6] ANTHONY LAMPKINS, a/k/a "Doo Daddy," [10] DESHAUNE JONES, a/k/a "Mexico," [27] KEAIRUS WILSON, a/k/a "Key-Thang," [28] MONTEZ HALL, a/k/a "Tez," [29] CEDRIC WOODS, a/k/a "Lil Ced," [30] RONDARIUS WILLIAMSON, a/k/a "Killa," and [32] KENNETH GADDIE, a/k/a "K.G." and others known and unknown to the Grand Jury, did conspire to knowingly use and carry firearms during and in relation to, and possess firearms in furtherance of, crimes of violence for which they may be prosecuted in a court of the United States, to wit, conspiracy to participate in a racketeering enterprise, murder in aid of racketeering, and assault with a dangerous weapon in aid of racketeering, as set forth in this Superseding Indictment, which are incorporated here.

All in violation of Title 18, United States Code, Sections 924(o) and 2.

COUNT TWENTY-EIGHT
(Conspiracy to Distribute Narcotics)

The Grand Jury Further Charges:

75. The allegations of Paragraphs 1-11, 14-19, and 22-23 are hereby re-alleged and incorporated as if fully set forth herein.

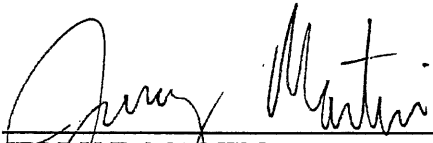
76. From in and around 2006 and continuing through in or about June 2010, in the Middle District of Tennessee and elsewhere, the defendants, [1] **LONNIE NEWSOME, a/k/a “Big Lonnie,”** [4] **TIM ALLEN, a/k/a “Lil’ Tim,”** [10] **DESHAUNE JONES, a/k/a “Mexico,”** [28] **MONTEZ HALL, a/k/a “Tez,”** [29] **CEDRIC WOODS, a/k/a “Lil Ced,”** and others, did knowingly and intentionally combine, conspire, confederate, and agree with persons known and unknown to the Grand Jury to commit offenses against the United States, that is, to knowingly and intentionally distribute and possess with intent to distribute 28 grams and more, but less than 280 grams, of a mixture and substance containing a detectable amount of cocaine base, that is, crack cocaine, a schedule II controlled substance; less than 500 grams of a mixture and substance containing a detectable amount of cocaine, a schedule II controlled substance; a mixture and substance containing a detectable amount of hydromorphone, that is, dilaudid, a schedule II controlled substance; and less than 50 kilograms of a mixture and substance containing a detectable amount of marijuana, a schedule I controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(B), 841(b)(1)(C), and 841(b)(1)(D).

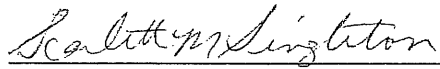
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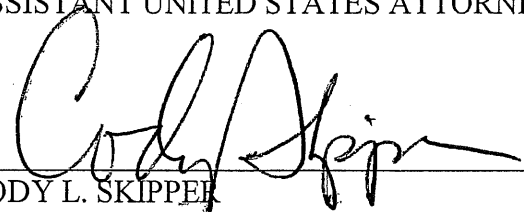
A TRUE BILL:

[REDACTED]

FOREPERSON


JERRY E. MARTIN
UNITED STATES ATTORNEY


SCARLETT SINGLETON
ASSISTANT UNITED STATES ATTORNEY


CODY L. SKIPPER
TRIAL ATTORNEY
ORGANIZED CRIME AND GANG SECTION